

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

OFFICE OF THE
REGIONAL ADMINISTRATOR

MAY 10 2011

The Honorable Jerry Brown
Governor of California
State Capitol Building, Suite 1173
Sacramento, CA 95814

Dear Governor Brown:

The United States Environmental Protection Agency (EPA) is considering placement of the Seam Master Industries and the Jervis B. Webb Co. sites on the Superfund National Priorities List (NPL), pursuant to its authority under Section 105 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, 42 U.S.C. § 9605. The sites are located in the City of South Gate, in Los Angeles County. With this letter, EPA is seeking the concurrence of the state of California on adding both of the sites to the NPL.

The Seam Master Industries site has been used for manufacturing hot-melt adhesive tape for laying carpets since 1972. Prior to 1972, Pacific Screw Products Corporation manufactured screw products at the property until the business went bankrupt. Historical Los Angeles County Department of Health Services Hazardous Waste Control Program surveys and notices of violations note the use of trichloroethylene (TCE) on the property and improper disposal of unusable oils and solvents. Soil on-site and groundwater at and downgradient of the site are contaminated with TCE. The TCE in groundwater beneath the site has been detected at levels up to 17,000 parts per billion (ppb).

The Jervis B. Webb Co. site was used concurrently by the Jervis B. Webb Co. and the Blake Rivet Company. The Jervis B. Webb Co. conducted metal fabrication, finishing, painting and assembly operations associated with the manufacture of industrial conveyor belt systems from the 1950s to early 1996 on a portion of the site. On a different portion of the site, Blake Rivet Company produced aluminum and stainless steel aircraft rivets. While historic soil contamination was removed at the direction of the California Regional Water Quality Control Board (RWQCB), since 2002 TCE has been detected in the groundwater beneath the site at levels up to 35,000 ppb.

TCE contamination at both of these sites is present above the drinking water Maximum Contaminant Level (MCL). The federal and California MCL for TCE in drinking water is 5 ppb. There are at least 35 drinking water wells within four miles of the site, serving approximately 226,000 people. Although the drinking water supply wells immediately downgradient of the two sites are screened in a deeper aquifer and are not currently contaminated, because the aquifers are connected, there is the potential that the drinking water wells may become contaminated. This is the basis of EPA's concern with the groundwater contamination in this area.

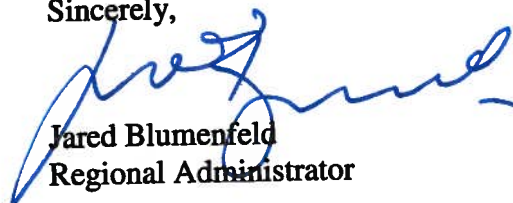
In May, 2002, EPA completed a Remedial Investigation of the nearby Cooper Drum NPL site. During the Remedial Investigation, as EPA was investigating the extent of the Cooper Drum groundwater plume, EPA identified the Seam Master Industries site as an additional source of groundwater contamination in the area. Based on additional groundwater sampling, EPA determined that the groundwater contamination from the Seam Master and the Jervis Webb sites was commingling with the Cooper Drum plume. Because the Seam Master Industries site was impacting the Cooper Drum remedy implementation, EPA requested that the California Department of Toxic Substances Control (DTSC) address the Seam Master Industries site. DTSC requested that the property owner and operator enter into a consent order, but both declined. The RWQCB – Los Angeles Region requested that DTSC take action on the Jervis B. Webb Co. site in 2007. DTSC issued an Order to the potentially responsible parties for the Jervis B. Webb Co. site to investigate and remediate the site, but no respondents complied with the Order. Consequently, DTSC requested that EPA assume the lead for these two sites to ensure that investigation work continues and cleanup work begins.

The full extent of the groundwater contamination needs to be characterized. In addition, because of the high concentrations of TCE in groundwater at both the Seam Master Industries and Jervis B. Webb Co. sites and the relatively shallow depth to groundwater (60 feet), there is a need to evaluate the potential for vapor intrusion of TCE from the sites into nearby buildings and residential areas. EPA is considering placement of these sites on the NPL to ensure the full force of CERCLA is available to investigate and clean up the sites as necessary. EPA may pursue potentially responsible parties to complete investigations and cleanup. However, if federal resources are required for cleanup, they are only available for sites on the NPL. EPA is committed to working cooperatively with the state and local community throughout the Superfund process.

We are requesting a written response to this letter from the state within 45 days. The letter should indicate either the state's concurrence for listing the sites on the NPL or the state's non-support for NPL listing. If the state does not support listing, EPA requests that the response letter provide the state's rationale as to why listing is not warranted, and identify the remediation program the state will employ to ensure the risks will be addressed. If EPA does not receive a written response from the state by the deadline provided above, we will assume the state is in agreement with EPA and we will proceed with the listing process. EPA appreciates your consideration in this matter.

Please do not hesitate to call me at 415-947-8702 if you wish to discuss this request, or your staff may wish to contact Jane Diamond, Director of the Superfund Division, at 415-947-8709.

Sincerely,



Jared Blumenfeld
Regional Administrator

cc: Linda Adams, Cal EPA
Debbie Raphael, DTSC